

### REMARKS

Claims 1-14 and 16-28 are pending. Claims 1-2, 7, 13, 14, and 16-19 are amended. Claims 25-28 are added. Applicants reserve the right to pursue original and other claims in this and any other application.

In a telephone conversation with Applicants' representative on November 17, Examiner LaRose helpfully clarified his reasons for rejecting claim 1 under 35 U.S.C. § 102(e) as being anticipated by Donnelly et al. (US Patent No. 6,002,800) ("Donnelly"). In response to Examiner LaRose's remarks, claim 1 and the other independent claims have been amended to recite an additional limitation not taught or suggested by the prior art. Applicants thank Examiner LaRose for taking time to speak with Applicants' representative and for this helpful clarification.

Claims 1, 2-9, 12-14, 16, and 20-24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Donnelly. The claims have been revised to incorporate an additional limitation not taught or suggested by Donnelly. Reconsideration is respectfully requested.

Claim 1 recites, *inter alia*, "[a]n image recognition device, for detecting arbitrary images, comprising: an element matching means arranged and configured to match an input image with target pattern elements obtained by dividing a target pattern into a plurality of target pattern elements along the shapes in the target pattern..."

By contrast, Donnelly recites, *inter alia*, "[a]pparatus for the detection of an image in an input pixel stream, said apparatus comprising: ... (2) cell converter means for forming cell data portions formed from regions of a corresponding image of said input pixel stream; ..." (Donnelly Claim 1)



Donelly teaches dividing an image to be compared into an array of *square* "cells." (Donelly Figures 4-6 and Column 5, Lines 24-30) By contrast, the claimed invention "divid[es] a target pattern into a plurality of target pattern elements *along the shapes in the target pattern.*" (Claim 1, Figures 3(a) and 5) Donelly does not teach or suggest "dividing a target pattern into a plurality of target pattern elements *along the shapes in the target pattern.*" For at least this reason, the rejection of claim 1 should be withdrawn and the claim allowed.

Claims 20 and 25 depend from claim 1 and are allowable for at least the reason stated above with respect to claim 1 and on their own merits. Therefore, the rejections of claims 20 and 25 should be withdrawn and the claims allowed.

Independent claims 2, 7, 13, and 14 each recite similar limitations as claim 1 and are allowable for at least the reason stated above with respect to claim 1 and on their own merits. Therefore, the rejection of claim 2, 7, 13, and 14 should be withdrawn and the claims allowed.

Claims 3-6 and 21 depend from claim 2 and are allowable for at least the reason stated above with respect to claim 2 and on their own merits. Therefore, the rejections of claims 3-6 and 21 should be withdrawn and the claims allowed.

Claims 8-12, 22, and 26 depend from claim 7 and are allowable for at least the reason stated above with respect to claim 7 and on their own merits. Therefore, the rejections of claims 8-12, 22, and 26 should be withdrawn and the claims allowed.

Claims 23 and 27 depend from claim 13 and are allowable for at least the reason stated above with respect to claim 13 and on their own merits. Therefore, the rejections of claims 23 and 27 should be withdrawn and the claims allowed.



Claims 16-19, 24, and 28 depend from claim 14 and are allowable for at least the reason stated above with respect to claim 14 and on their own merits. Therefore, the rejections of claims 16-19, 24, and 28 should be withdrawn and the claims allowed.

Claims 10 and 11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Donelly. In view of the above amendment to claim 7, Applicants believe claims 10 and 11 are allowable. Reconsideration is respectfully requested.

Claim 18 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Donelly in view of Fukushima et al. (U.S. Patent 6, 185,321) ("Fukushima"). In view of the above amendment to claim 14, Applicants believe claim 18 is allowable. Reconsideration is respectfully requested.

Claim 17 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Donelly and Hasuo et al. (U.S. Patent 5,583,614) ("Hasuo"). In view of the above amendment to claim 14, Applicants believe the claim 17 is allowable. Reconsideration is respectfully requested.

Claim 19 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Donelly and Funada et al. (U.S. Patent 5,257,119) ("Funada"). In view of the above amendment to claim 14, Applicants believe claim 19 is allowable. Reconsideration is respectfully requested.



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For at least the reasons stated above, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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